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**UNITED STATES DISTRICT COURT  
 NORTHERN DISTRICT OF CALIFORNIA**

ANIBAL RODRIGUEZ, JULIEANNA  
 MUNIZ, ELIZA CAMBAY, SAL  
 CATALDO, EMIR GOENAGA, JULIAN  
 SANTIAGO, HAROLD NYANJOM,  
 KELLIE NYANJOM, and SUSAN LYNN  
 HARVEY, individually and on behalf of all  
 others similarly situated,

Plaintiffs,

vs.

GOOGLE LLC,

Defendant.

Case No.: 3:20-cv-04688

**[PROPOSED] ORDER GRANTING  
 PLAINTIFFS' REQUEST TO DISCLOSE  
 PROTECTED MATERIALS TO  
 CERTAIN EXPERT CONSULTANTS**

The Honorable Alex G. Tse  
 Courtroom A – 15th Floor  
 Trial Date: Not Yet Set

**[PROPOSED] ORDER**

Before the Court are the parties' letter briefs regarding Plaintiffs' request for Google to use additional search terms on ESI belonging to five custodians: Dave Monsees, Steve Ganem, Francis Ma, Edward Weng, and Todd Hansen. Having considered the parties' letter briefs, and good cause having been shown, the Court GRANTS Plaintiffs' request.

Google shall run the following search terms on the specified custodians' ESI to locate documents responsive to Plaintiffs' Requests for Productions.

**Search Term No. 40b (For Francis Ma)**

- (FCM OR "cloud messaging") /15 (firebase OR perform\* OR event OR audience)

**Search Term No. 40c (For Todd Hansen)**

- (FCM OR "cloud messaging") /5 firebase
- (FCM OR "cloud messaging") /10 (perform\* OR event OR audience)

**Search Term No. 43b (For Steve Ganem)**

- (Firebase OR Gold) /15 (((app or apps or application or applications) /5 (event OR interact\* OR activity OR measure\*)) OR WAA\* OR sWAA OR "my account" OR "my activity" OR perform\* OR conversion\* OR event OR audience OR AdMob OR FCM OR "Cloud Messaging" OR appmeasurement OR "Google Mobile Service" OR GMS OR Clearcut)
- (Analytics OR GA4F OR Scion OR "Google Mobile Platform" OR GMP) /15 (conversion\* OR perform\* OR event OR audience OR "Google Mobile Service" OR GMS OR Clearcut)

**Search Term No. 43c (For the Other Custodians)**

- ("Google Mobile Service" OR GMS OR Clearcut) /10 (firebase OR perform\* OR event OR audience)

**IT IS SO ORDERED.**

DATED: \_\_\_\_\_

Honorable Alex G. Tse  
United States Magistrate Judge